

STATEMENT OF BASIS (AI No. 41182)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0091448 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Crosby Linen Service, Inc.
198 Celestine Dr.
Golden Meadow, LA 70357

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: April 16, 2009

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: March 1, 2004
LPDES permit expiration date: February 28, 2009
EPA has not retained enforcement authority.

C. Date Application Received: September 8, 2008

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - linen service facility

This is an existing linen service facility that provides laundry cleaning for catering services. This includes washing of towels and linens.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: III (BPJ points to 0 as per previous permit)
3. Wastewater Type: III
4. SIC code: 7213

C. LOCATION - 198 Celestine Dr. in Golden Meadow, Lafourche Parish
Latitude 29°22'07", Longitude 90°15'27"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater and laundry wastewater
Treatment: three-cell oxidation pond
Location: at the point of discharge from the oxidation pond
(Latitude 29°22'05", Longitude 90°15'48")
Flow: 15,000 gpd
Discharge Route: unnamed ditch, thence into an unnamed canal, thence into an unnamed slough, thence into Bayou Sevin

4. RECEIVING WATERS

STREAM - unnamed ditch, thence into an unnamed canal, thence into an unnamed slough, thence into Bayou Sevin

BASIN AND SEGMENT - Terrebonne Basin, Segment 120706*

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation**

*The physical location of the front gate is in subsegment 020403 of the Barataria Basin. Outfall 001 is located in subsegment 120706 of the Terrebonne Basin. As per the Soil Survey of Lafourche Parish, the flow of discharge remains in subsegment 120706. Therefore, for the purposes of issuing this permit, subsegment 120706 will be used in the development of requirements.

**Oyster Propagation is listed as a designated use of Segment 120706 (Bayou Blue - Boundary between segments 1206 and 1207 to Lake Raccourci). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody, per LAC 33:IX.1111.E.

5. TMDL WATERBODIES

Subsegment 120706, Bayou Blue-From Bully Camp Canal to Lake Raccourci, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

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6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Changes from previous permit: the fecal coliform weekly average limit has been changed to a daily max limitation.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

LDEQ records were reviewed, and no records of compliance actions were found.

B. DMR Review/Excursions - The DMRs were reviewed for the period of January 2007 through December 2008.

DATE	PARAMETER	OUTFALL	REPORTED VALUE		PERMIT LIMITS	
			MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM
12/07	pH	001		9.22	6	9
3/08	pH	001		9.54	6	9

8. EXISTING EFFLUENT LIMITS

Outfall 001

	Monthly Avg./Weekly Avg.	Frequency	Sample Type
Flow	Report Report	1/3months	Estimate
BOD	30 45	1/3months	Grab
TSS	90 135	1/3months	Grab
Fecal Coliform 200	400	1/3months	Grab
pH	6 (min) 9 (max)	1/3months	Grab

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120706 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2341.B.14.a-k, stormwater discharges from facilities classified as 7213 are not considered to be associated with industrial activities. Therefore, an SWP3 is not included in the permit.

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Rationale for Crosby Linen Service, Inc.

1. Outfall.001 treated sanitary wastewater and laundry wastewater (estimated flow is 15,000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l)	<u>Reference</u>
Flow (GPD)	Report:Report	BPJ; *
BOD ₅	30:45	BPJ; Class II Sanitary Discharge General Permit
TSS	90:135	BPJ; Class II Sanitary Discharge General Permit
Fecal Coliform	200:400 (Daily Max.)	BPJ; Class II Sanitary Discharge General Permit
pH (su)	6.0-9.0	BPJ; Class II Sanitary Discharge General Permit

Treatment: three-cell oxidation pond

Monitoring Frequency: quarterly in consistency with the Class II General Permit.

Limits Justification: Sanitary wastewaters (internal or external) are regulated in accordance with LAC 33:IX.711 or 709.B and by BPJ utilizing the sanitary general permits issued by this Office.

Concentration limits are in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD and TSS in terms of concentration.

Although the effluent from this facility is similar to sanitary wastewater and is treated by biological means to meet the effluent limitations, coverage under a Sanitary General Permit is prohibited because the facility is not a coin-operated laundromat or an on-site residential laundry facility, as specified in Section A. Applicability of the Sanitary General Permits.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.